### Compliance Deadlines for CMS Vaccine Mandate

*As of Jan. 14, 2022 and not expected to change*

<table>
<thead>
<tr>
<th>Deadlines</th>
<th>For Group One states*</th>
<th>For Group Two states*</th>
<th>Full compliance (CHC must meet both criteria)</th>
<th>Less-than-fully-compliant, but not subject to additional enforcement beyond an initial notice of non-compliance (CHC must meet all 3 criteria)</th>
<th>Out of compliance and subject to enforcement action</th>
</tr>
</thead>
<tbody>
<tr>
<td>&quot;Phase One&quot;</td>
<td>Between Dec. 28, 2021 and Jan. 27, 2022</td>
<td>Between Jan. 14 and Sun. Feb. 13, 2022</td>
<td>P&amp;Ps have been developed and implemented</td>
<td>P&amp;Ps have been developed and implemented</td>
<td>CHC does not meet one or more of the three criteria under &quot;Less than fully-compliant.&quot;</td>
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<td>&quot;Phase Two&quot;</td>
<td>Between Fri. Jan. 28 and Mon. Feb. 28, 2022</td>
<td>Between Mon. Feb. 14 and Tues. March 15</td>
<td>P&amp;Ps have been developed and implemented</td>
<td>P&amp;Ps have been developed and implemented</td>
<td>CHC does not meet one or more of the three criteria under &quot;Less than fully-compliant.&quot;</td>
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<tr>
<td>Full Enforcement</td>
<td>From Tues. March 1 forward</td>
<td>From Wed. March 16 forward</td>
<td>P&amp;Ps have been developed and implemented</td>
<td>CHCs that are less-than-fully-compliant will no longer have an option to avoid additional enforcement action.</td>
<td>CHC does not meet one or more of the three criteria under &quot;Full Compliance.&quot;</td>
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</tbody>
</table>

*Group One States: CA, CO, CT, DE, DC, FL, HI, IL, ME, MD, MA, MI, MN, NV, NJ, NM, NY, NC, OR, PA, PR, RI, TN, VT, VA, WA, WI, other territories. (CMS mandate went back into effect in mid-December.)*

*Group 2 States: AL, AK, AZ, AR, GA, ID, IN, IA, KS, KY, LA, MS, MO, MT, NE, NH, ND, OH, OK, SC, SD, UT, WV, WY. (CMS mandate went back into effect on Jan. 13, 2022)*
Percentage definition #1:

**Numerator:** Those “staff” who fall into any of the following categories:
- have received at least one vaccine dose;
- have a pending request for an exemption or delay; or
- have been approved for an exemption or delay.

**Denominator:** All “staff” who are subject to the CMS vaccine mandate. See Toolkit at shorturl.at/zJOX8 for a chart detailing the definition of “staff”.

Percentage definition #2:

**Numerator:** Those “staff” who have either:
- completed their initial vaccine series (i.e. two Pfizer or Moderna, or one J&J) OR
- have an approved request for an exemption or delay. (In other words, staff with only one Pfizer or Moderna shot, or who have requested but not yet received an exemption/delay, no longer count in the numerator.)

**Denominator:** All “staff” who are subject to the CMS vaccine mandate. See Toolkit at shorturl.at/zJOX8 for a chart detailing the definition of “staff”.